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Attorneys for Plaintiff  
RICHARD CARRASCO

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RICHARD CARRASCO,  
  
Plaintiff,  
  
v.  
  
OFFICER CAMPAGNA, et al.,  
  
Defendants.

Case No. C 03-4727 SBA (PR)

**STIPULATION AND ORDER TO ALLOW  
DEPOSITION OF INMATES WITNESSES**

WHEREAS, Plaintiff Richard Carrasco, a state prisoner, filed a *pro se* civil rights complaint under 42 U.S.C. § 1983 alleging that he was subjected to excessive force by Defendants Officer Campagna and Officer Holguin on October 15, 2002, while incarcerated at the Main Jail of the Santa Clara County Department of Correction.

WHEREAS, trial in this matter is set to begin on February 26, 2007.

WHEREAS, both parties wish to depose inmate witnesses but have learned that state prisons where inmates are presently incarcerated, require a court order for such depositions.

WHEREAS, parties' attorneys agree to take the depositions of the inmate witnesses.

NOW, THEREFORE, IT IS HEREBY STIPULATED BY AND BETWEEN THE  
UNDERSIGNED PARTIES THAT,

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SENT BY: COUNTY COUNSEL;

4082927240;

SEP-25-06 10:10AM;

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Sep-22-06 11:48am From-COOLEY GODWARD LLP

650 857 0663

T-762 P.003/003 F-572

The following inmates shall be produced for deposition by the prison incarcerating them for counsel of either Defendants Officer Campagna and Officer Holguin or Plaintiff Richard Carrasco in the above-captioned matter at a mutually agreeable time:

John Cahill

Ulysses Cuen

David Gonzales

Marcus Law

Ivan Corrales

Doc Dao Hien

Richard Cramphorn

Dated: September 22, 2006

COOLEY GODWARD LLP  
GRANT P. FONDO (181530)  
BRANDON KIMURA (241220)  
JESSICA VALENZUELA SANTAMARIA (220934)

*Brandon Kimura*  
Brandon Kimura (241220)  
Attorneys for Plaintiff  
RICHARD CARRASCO

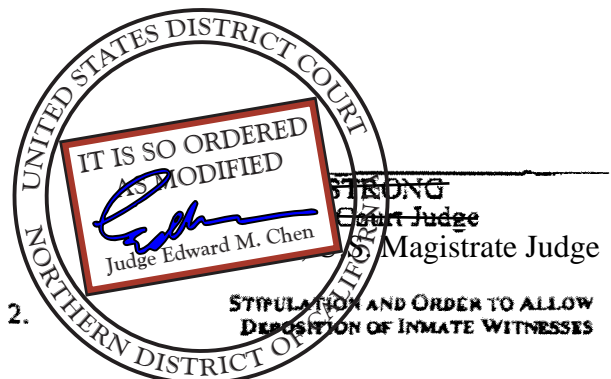
Dated: September 22, 2006

OFFICE OF THE COUNTY COUNSEL  
ANN MILLER RAVEL (62139)  
MELISSA R. KINIYALOCKS (215814)

*Melissa R. Kinialocks*  
Melissa R. Kinialocks (215814)  
Attorneys for Defendants  
OFFICER CAMPAGNA and OFFICER HOLGUIN

IT IS SO ORDERED.

Dated: October 4, 2006



**PROOF OF SERVICE**  
**(FRCP 5)**

I am a citizen of the United States and a resident of the State of California. I am employed in Santa Clara County, State of California, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action. My business address is Cooley Godward LLP, Five Palo Alto Square, 3000 El Camino Real, Palo Alto, California 94306-2155. On the date set forth below I served the documents described below in the manner described below:

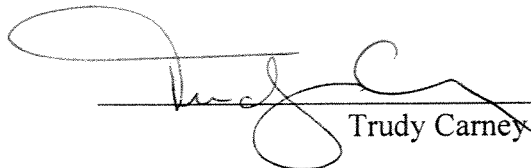
**STIPULATION AND ORDER TO ALLOW DEPOSITION OF INMATES WITNESSES**

- ☒ (BY U.S. MAIL) I am personally and readily familiar with the business practice of Cooley Godward LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Palo Alto, California.
- ☐ (BY MESSENGER SERVICE) by consigning the document(s) to an authorized courier and/or process server for hand delivery on this date.
- ☐ (BY FACSIMILE) I am personally and readily familiar with the business practice of Cooley Godward LLP for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.
- ☐ (BY ELECTRONIC MAIL) I am personally and readily familiar with the business practice of Cooley Godward LLP for the preparation and processing of documents in portable document format (PDF) for e-mailing, and I caused said documents to be prepared in PDF and then served by electronic mail to the parties listed below.

on the following part(ies) in this action:

Melissa R. Kinyalocis, Esq.  
 Office of County Counsel  
 70 West Hedding Street, West Wing, 9th Floor  
 San Jose, CA 95110-1705

Executed on September 25, 2006, at Palo Alto, California.

  
 \_\_\_\_\_  
 Trudy Carney